

# **TPAC**

## **Code of Conduct**

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**Thai Plaspac Public Company Limited**

## **Introduction**

Thai Plaspac Public Company (Limited) and the subsidiaries (the “Company”) are committed to conducting our business in fair and ethical business practices to ensure the best interests of all shareholders or stakeholders and to realize the sustainable development of the organization. The Company has formulated a code of conduct for directors, executives, employees, and stakeholders. The Company abides by laws, policies, ethics, and business integrity standards in its behavior, to hold on to and adopt as guidelines for work appropriately.

This Code of Conduct has been established to define good practices in conducting business operations, so that Directors, Executives, Employees, and Stakeholders of the Company have an understanding of the principles and guidelines, as well as exercise discretion in performing their duties in accordance with the Code of Conduct throughout the organization, for the utmost benefit of all parties in a fair manner.

# The Company Ideology



## Vision

To be a company whose innovations positively impact our world, and a place attractive to the most passionate packaging minds.



## Mission

To collaborate passionately, always showing our customers *what's new*.

## Core Value

### Value #1 Dream

TPAC dreams to be a global company and a leader in packaging innovation. It can only start with a dream.

### Value #2 In Data We Trust

If you can't measure it, you can't improve it.

### Value #3 Lifelong Learners

Our mindset is one of continuous learning, always a student, always curious.

### Value #4 Listen

Customers talk, we listen.

## Definition

- **Ethics** refers to good conduct that is established to be observed, or ethics which means to treat others with fairness.
- **Code of Conduct** refers to the standards of conduct established to ensure that Directors, Executives, Employees, and Stakeholders adhere to the principles of good practice. These code of conduct standards must be sufficiently clear to prevent misconduct or degradation and reflect the organization's expectations for everyone to act in accordance with the law and regulations, and the culture of the organization. Additionally, code of conduct should be reviewed or updated regularly to ensure that the guidelines for ethical behavior are contemporary and to provide confidence that the guidelines for integrity and professionalism are consistently high standards.
- **The Company** refers to Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Directors** refers to the directors of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Executives** refers to the executives of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Employees** refers to the employees of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Stakeholders** refers to persons or groups of persons directly or indirectly impacted by the Company's business, such as directors, employees, shareholders, contractual parties, contractors, business contacts, creditors, debtors, society at large, and communities where the Company operates.
- **Supplier** refers to the Supplier, Contractors, and Service providers of the Company
- **Customer** refers to the purchasers, users of the products and service receivers.

## Code of Conduct

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### Laws and Regulations Practices

The Company is committed to complying with all applicable laws and regulations in the countries in which we operate, including relevant international laws and regulations, such as sanctions, export controls, reporting obligations, data protection, fair-trade competition, etc.

#### Guidelines

1. Thoroughly uphold the rules, regulations, and standards of conduct as prescribed by the Company's regulations.
2. Every personnel is obligated to comply with the laws and regulations that are legally enforceable.

### Human Rights and Labor Practices

The Company recognizes the importance of respecting the human rights of all and has formulated policies and guidelines in the Human Rights and Labor Practices Policy that do not violate human rights, and respect for human rights by directors, executives, employees, and stakeholders of the Company. The Company also considers the importance of labor. The Company treats employees in accordance with labor laws and other regulations.

#### Guidelines

3. Treat all people based on human dignity, respect rights, obligations, and individual rights, prohibit human rights violations, and refrain from physically, sexually, mentally, verbally, harassing, or intimidating others in any form.
4. Treat all people with respect, and dignity and treat everyone equally without discrimination due to race, age, role, sex, gender identity, color, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, trade union membership or political views.
5. Directors, executives, employees, and stakeholders of the Company have the right to freedom of association, and collective bargaining is recognized and respected. Employees must not be intimidated or harassed in the exercise of their legal right to join or refrain from joining any organization.
6. Safeguarding and maintaining the personal data of employees, customers, and the Company, refraining from disclosing personal data to the public without prior consent or authorization from the individuals concerned.
7. Avoid forced labor, human trafficking, or illegal use of child labor, including the punishment of physical and mental abuse of employees, whether through any form of physical or mental coercion, slave trade, or any form of human trafficking.
8. Get remuneration that includes wages, overtime pay, other benefits, and paid leave that meets or exceeds the legal minimum standards or appropriate industry standards, and compensation terms established by legally binding collective bargaining agreement fairly.
9. Not infringing upon the human rights of others. The Company has established a mechanism for receiving complaints covering the protection against human rights violations and non-compliance with this code of conduct, as outlined in the Whistleblowing policy. Fair and impartial treatment will be provided to individuals who experience or witness human rights violations, utilizing measures to protect complainants.

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## Code of Conduct

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### Employee Practices

The Company implements the Company's rules and regulations by formulating company policies, rules, articles of association, and articles of association, which are observed by directors, executives, employees, and stakeholders of the Company to ensure the orderly conduct of the Company's activities.

#### Guidelines

1. Perform duties with honest and transparent determination.
2. Avoid giving gifts to superiors or accepting gifts from subordinates.
3. The supervisor should respect the employee, and the employee should not do anything that disrespects the supervisor.
4. Maintain discipline and abide by organizational rules and good traditions, whether it is stipulated in writing or not.
5. Jointly create and maintain the unity and unity atmosphere of the group.
6. Avoid any behavior that may damage the reputation and image of the Company or cause problems for the Company in the future.

### Occupational Safety, Health, and Working Environment

The Company is concerned about the life and health of all personnel by conducting the Occupational Safety, Health, and Working Environment policy, Therefore, carrying out its actions in occupational safety health and working environment.

#### Guidelines

1. Consider safety as the duty and responsibility in the performance of work for everyone.
2. Promote and instill awareness in maintaining health and safety for employees, communities, and those involved.
3. Operate by-laws, standards, and practices regarding safety, occupational health, and the working environment.
4. Promote a hygienic and safe workplace by aiming to prevent accidents and injuries that occur from or occur during work or as a result of the employer's operations.
5. Support and promote awareness of safe work practices, as well as supervise employees, suppliers, contractors, and contractors or work within the Companies to strictly comply with the prescribed safety and occupational health rules and regulations.

### Environmental and Community

The Company is committed to conducting sustainable growth business in accordance with the principles of protecting the environment, social responsibility, and corporate governance.

#### Guidelines

1. Be responsible and committed to preserving the environment as well as the local community and traditions where the organization is located.
2. Regularly conduct activities to contribute to society, communities, and the environment, so that the communities where the Company is located have an improved quality of life, through both direct implementation and cooperation with the government and communities.
3. Prevent accidents and control the release of waste to levels below acceptable standards.

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## Code of Conduct

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4. Respond quickly and effectively to incidents that impact the environment and communities arising from the operations of the Company, by fully cooperating with government officials and relevant agencies.
5. Respect the rights and ownership of individuals' property and land, including use and transfer must be in accordance with the principles of prior and free consent, transparency, and disclosure.

### Confidentiality of information

The Company respects the privacy rights of relevant personnel and protects the personal information of customers, directors, executives, employees, stakeholders, and contractors within the Company, must be protected and not be disclosed in a way that infringes their legal rights following by Privacy Policy of the related parties.

#### Guidelines

1. Respect the personal information of others. If using, disclosing, or transferring personal information of others, consent must be obtained from that person and it must not violate rights under the law.
2. Those responsible for maintaining data in the possession or care of the group of companies must protect the personal information of directors, executives, employees, those involved with the group of companies, and stakeholders. Therefore, the use, disclosure, or transfer of personal information of directors, executives, employees, those involved with the group of companies, and stakeholders can only be done as necessary for normal work duties and must not violate rights under the law.

### IT Security

The Company values the effective use of information technology and establishes norms for the safe use of information technology to prevent information leakage and misuse, including the destruction of the resources and network.

#### Guidelines

1. Use the information technology system in accordance with the Computer Law and Related Crime Act.
2. Use the information technology system, including internal data, for the benefit of the Company only.
3. Limit access to internal data according to the level of data confidentiality, and allow access only to those involved or authorized to access the data.
4. All data related to the business operations of the Company must be stored and maintained on the user's computer and server system and must be backed up regularly to prevent data loss.
5. Remote access to the Company's network system must have proper user authentication and comply with remote network connection practices.
6. Avoid opening files of unknown origin and using insecure data storage devices to avoid risks from viruses, malware, unauthorized software, etc. Information technology devices must be inspected and have their anti-virus software updated by the Company's staff regularly.

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COMPANY REGISTRATION NO. AND TAX ID : 0107547000575

## Code of Conduct

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### Custody and Use of Corporate Assets

The Company encourages directors, executives, employees, and stakeholders of the Company to effectively utilize corporate assets for the maximum benefit, not to lose, damage, or use for the benefit of oneself or others.

#### Guidelines

1. Be responsible for keeping the property of the Company, and shall not deteriorate, lose, or effectively use the property for the full benefit of the Company, and shall not use the corporate assets for the benefit of oneself or others unrelated to the business operations of the Company.
2. Property refers to tangible and intangible assets, such as property, real estate, technology, knowledge, patents, copyrights, Unpublished confidential information, financial estimates, and personnel information, which must avoid the disclosure or abuse of confidential information. The exception is compliance with laws related to the business operations of the Company.

### Securities Trading and Use of Inside Information

Use of internal information as sensitive information of the Company, directors and executives, employees, and stakeholders of the Company must take appropriate actions and must consider the overall impact on stakeholders, accuracy, and legal requirements. The information shall not be used for personal or other unrelated to the business operations of the Company.

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*Internal information refers to general information that has not been publicly disclosed, such as annual sales figures, financial statements, investment participations, acquisitions, concession applications / confidential information such as trade data, production formulas, innovations, trade secrets, information on new products, etc.*

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#### Guidelines

1. Avoid using insider information for one's benefit in insider trading or providing internal information to others to insider trading.
2. Directors, executives, and employees who have access to internal information as defined by the Stock Exchange of Thailand (SET), such as the Company secretary, investor relations, and financial accounting personnel are responsible for reporting the trading status of the Company's securities within 3 working days to prevent insider trading. And avoid making complaints about the appropriateness of insider stock trading.
3. Should refrain from insider trading before the release of financial statements in accordance with the regulations of the Stock Exchange of Thailand (SET) or relevant regulatory agencies. The Company status, including other important information before buying or selling Company securities, should wait at least 24 hours after disclosing the information to the public.
4. Trade secrets which are internal information of the Company must be kept confidential and not leaked to outside parties. The confidentiality of such information may be divided into levels of importance. The sharing and use of internal information must only be within the scope of one's assigned duties and responsibilities.

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### Conflict of Interest

The Company is committed to doing the right thing. By the practice of the directors, executives, employees, and Company stakeholders must adhere to the highest benefits of the Company in morality, ethics, and legally. Avoid actions that could be conflicts of interest.

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*Conflict of interest refers to the overlap between personal interests and the company's interests, where one's position in the company influences the performance of duties in that position and affects the overall interests, resulting in interference with impartial decision-making.*

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### Guidelines

1. Avoid any actions that are contrary to the interests of the Company whether caused by contact with commercial parties of the Company such as business partners, customers, or competitors, or from the using opportunities or information obtained from being directors, executives, employees, or stakeholder of the Company in finding personal benefits and in terms of doing business that competes with the companies or other work aside from the work of the Company which affects the work in duties.
2. Employees thus refrain from holding shares in the competitors of the Company. If doing or refraining from Acting as a duty or having an impact on work in duties. If the stock is received before employment or before the Company goes into that business or acquired through inheritance, must report to the supervisor according to the hierarchy.

### Anti-Corruption

The Company is committed to conducting anti-corruption. The Company directors, executives, employees, and stakeholders must strictly comply with the defined Anti-Corruption Policy and are prohibited from being involved with any form of corruption either directly or indirectly.

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*Corruption refers to the seeking of illicit gain or benefits for oneself or others, by abusing one's position, duties, power, and influence*

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### Guideline

1. Do not engage in any act involving corruption, bribery, extortion, or embezzlement of any kind for direct or indirect personal benefit, or for the benefit of family, friends, and acquaintances, whether as recipient, giver, or proposer of bribes, whether monetary or non-monetary, to the government or private agencies that the Company does business with or is in contact with. Must strictly comply with the anti-corruption policy.
2. Do not accept, or give gifts, or souvenirs in the form of cash, checks, bonds, shares, gold, gems, real estate, or similar items to those involved that you come into contact with and coordinate within both government and private agencies.
3. Do not accept any property, gifts, presents, or other benefits that would improperly influence you to neglect your duties. Before accepting souvenirs, ensure compliance with the laws and regulations of the Company. Gifts exchanged in official duties should be of modest value and appropriate for the occasion.
4. Do not give any property, gifts, presents, or other benefits to induce decisions or unfairly influence the recipient to not treat you commercially on par with other business partners. Gifts for occasions must be of modest and reasonable value.

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## Code of Conduct

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5. Do not act as an intermediary to offer money, property, belongings, or other benefits to those involved with the business, government agencies, or any organization in exchange for undue special privileges or to cause government officials to neglect rules, regulations, and legal practices.
6. Procurement must go through the procedures prescribed by the Company's regulations in a transparent and auditable manner.
7. Business entertainment expenses and other expenses related to business contracts can be made but must be reasonable and auditable.
8. Charitable donations must be handled as follows:
  - 8.1 Use of the Company's money or property for charitable donations must be made in the name of the Company only. Donations must go to foundations, charities, temples, hospitals, or socially beneficial organizations that are certified, reliable, and auditable, following the Company's regulations.
  - 8.2 Personal charitable donations are acceptable but must not be related to or raise suspicion of corrupt practices for undue benefits.
9. Use of the Company's money or property to support projects must be in the name of the Company only. The funding provided must have legitimate business objectives that benefit the Company's image and reputation. Reimbursement claims must clearly state the purpose and have auditable evidence.
10. Do not engage in any political activities within the Company, and do not use any of the Company's resources for such purposes. The Company maintains political neutrality, supports lawful democratic governance, and does not provide any direct or indirect political assistance to any party.
11. If any acts of corruption or seeming corruption related directly or indirectly to the Company are witnessed, do not neglect or ignore such behavior. Report immediately to the Managing Director, Company Secretary, or through the whistleblowing channels prescribed in the Whistleblowing Policy.
12. Directors and executives must recognize the importance of providing knowledge, and advice and fostering understanding among subordinates about anti-corruption measures to ensure employee compliance with the anti-corruption policy, as well as being good role models of integrity, ethics, and conduct themselves.

### Customer Relations and Product Quality

The Company places great importance on customers, in order to ensure that products and services are safe and comply with product quality and safety standards on par with relevant industry and international standards, in accordance with customer agreements. Prioritize product safety and quality from the design, raw material procurement, transportation, and service stages, including providing complete product and service information, in line with the Company's quality policy.

#### Guideline

1. Produce and provide services with consideration for the quality and safety of customers' products throughout their service life.
2. Store and deliver products and services to meet the specifications and quality and safety criteria specified in the relevant contract or product documents to ensure they are safe for their intended use.
3. Provide accurate, sufficient, and timely information about products and services to customers. So that customers have enough information to make decisions. Without exaggerating the truth, both in advertising or in other channel communication with

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## Code of Conduct

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- customers, which causes customers to misunderstand about the quality, quantity, or any conditions. of products or services.
4. Always safeguard confidential information, know-how and intellectual property. All information provided through our relationships that is not in the public domain is deemed confidential and is only to be used for its intended and designated purpose.
  5. Respond to customer needs quickly and provide systems and channels for customers to complain about the quality of products and services efficiently.

### Suppliers/Creditors Practices

The Company has adhered to the practice of partners and creditors fairly, and honestly, and has not taken advantage of the partners. Which will comply with fair contracts to partners by avoiding causing conflicts of interest and there are various problems. Based on business relationships.

#### Guideline

1. Treat trading partners and creditors equally and fairly and based on receiving fair returns both parties comply with contracts or conditions that were strictly agreed upon in case of being unable to practice. According to one of the conditions must immediately notify suppliers and/or creditors in advance to jointly consider finding solutions.
2. In business negotiations should refrain from calling or paying any benefits. That is dishonest in trade with suppliers and/or creditors. If there is information that any benefits have been requested, received, or paid where dishonesty occurs. Therefore, revealing details to suppliers and/or creditors then work together to solve problems fairly and quickly.
3. Regularly report accurate, complete, and timely financial information to creditors.

### Antitrust/Anticompetitive practices

The Company is committed to conducting business fairly. By considering the ethics of business in accordance with trade laws in various countries the Company operates both to customers and trade competitors.

#### Guideline

1. Behave under the framework of the competition fairly, freely, and transparently, not taking advantage.
2. Do not seek the secret information of commercial competitors with dishonest methods. Or inappropriate, such as paying employees for competitors, etc.
3. Information received through legitimate methods and for legal objectives only by complying with all relevant laws and regulations. Do not try to disclose information about competitors that are delicate in commercial or secret. And not public treasure at any time
4. Do not destroy the reputation of competitors with a bad allegation. Creating false news or competitors. Refrain from any actions that would cause price distortion, which would be detrimental to consumers.
5. Do not agree with competitors or any person in a way to reduce or limit trade competition.
6. In contacting competitors, the Company personnel must not disclose or neglect the secrets of the Company in the hands of the competition.

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### Whistleblowing

The Company respects and places importance on complaints, suggestions, or opinions from all stakeholders. Additionally, there are measures in place to protect and treat whistleblowers and complainants fairly, with utmost consideration for the safety of the whistleblower, witnesses, or related persons. The guidelines are stipulated in the Company's Whistleblowing Policy.

#### Guideline

1. If any violation of this Code of Conduct is witnessed or experienced, opinions should be provided through the available channels. The witness or affected party will receive fair treatment and protection from the Company. Investigations will be conducted confidentially, with a primary emphasis on the safety of the whistleblower and information sources.
2. Report misconduct to the following channel:
  - Postal mail to Secretary Center  
Thai Plaspac Public Company Limited  
4th, floor Thai Plaspac Public Company Limited, No.77 Soi Thian Thaley 30,  
Bang Khun Thian-Chay Thaley Road, Tha Kham, Bang Khun Thian, Bangkok,  
10150.
  - Email  
IR Center: IR@tpacpackaging.com  
Compliance: Ethics@tpacpackaging.com  
Secretary Center: Secretary@tpacpackaging.com
  - Telephone  
Tel. 02-897-2250 ext. 179 (IR Center)
  - Electronic Box on the company website: www.tpacpackaging.com
  - Suggestion/comments/complaints box available within the Company
3. Upon receiving clues or complaints, the Company will consider and investigate the information confidentially. Only the assigned investigation team can access the information unless legally required to disclose it.
4. Disciplinary action will be taken if the offender is found guilty, which may lead to termination of employment or position. For serious legal violations, the group will take appropriate legal action.
5. In addition to violations of the Code of Conduct, the Whistleblowing Policy also covers incidents of fraud and corruption, legal/regulatory violations, actions that tarnish the group's reputation or impact the group, human rights violations such as discrimination, unfair treatment, sexual harassment, etc. Details on measures and procedures can be found in the Whistleblowing Policy.